

FILED

MAR 31 2021

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAUL SUMOWSKI,

Defendant.

4:21CR224 AGF/NCC

INDICTMENT

COUNT I (Transportation)

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term

(a) “minor” to mean any person under the age of eighteen years (18 U.S.C.

§2256(1));

(b) “sexually explicit conduct” to mean actual or simulated--

(i) sexual intercourse, including genital-genital, anal-genital, oral-genital,

oral-anal, whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C.

§2256(2)(A));

(c) “computer” to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. §2256(6));

(d) “child pornography” to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. §2256(8)).

2. The “Internet” was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about November 8, 2019, and on or about November 14, 2019, within the Eastern District of Missouri and elsewhere,

PAUL SUMOWSKI,

the defendant herein, did knowingly transport child pornography using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer or tablet, to wit, defendant transported via the internet, image files that contained child pornography, including, but not limited to, the following:

1. “boy man kyo on Vimeo_4” – a graphic video that depicts s a minor male in lascivious display of his genitals and engaged in oral-genital sexual intercourse with an adult male;
2. “Devon2” – a graphic video that depicts a graphic video that depicts s a minor male in lascivious display of his genitals and engaged in oral-genital sexual intercourse with an adult male;
3. “BL_S 258” – a graphic video that depicts a minor male in lascivious display of his genitals and engaged in sadistic or masochistic abuse

In violation of Title 18, United States Code, Sections 2252(a)(1) and 2.

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

DIANNA R. COLLINS, #59641MO
Assistant United States Attorney